

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : Case No. 08-13555 (JMP)
: (Jointly Administered)
Debtors. :
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**DECLARATION OF JAMES K. GOLDFARB
IN SUPPORT OF DEBTORS' REPLY**

1. I am a member of the bar of this Court and an associate with the law firm of Jones Day. Jones Day is counsel to the Debtors.

2. I offer this declaration in support of the Debtors' reply in response to the Objection of Norton Gold Fields Limited to Motion of the Debtors and Debtors in Possession pursuant to Sections 105(a), 362, and 365 of the Bankruptcy Code to Compel Performance by Norton Gold Fields Limited of its Obligations under an Executory Contract and to Enforce the Automatic Stay, and in support of such motion.

3. Attached hereto as Exhibit A is a copy of the invoice from Lehman Brothers Commercial Corporation ("LBCC") to Norton Gold Fields Limited ("Norton"), dated December 31, 2009.

4. Attached hereto as Exhibit B is a copy of Norton's ASX/Media Announcement, *Statement of Norton Chairman, A. Anthony McLellan, at Norton's Annual General Meeting*, dated November 30, 2009.

5. Attached hereto as Exhibit C is a copy of the Voluntary Petition (Chapter 11) of Lehman Brothers Holding Inc., dated September 14, 2008, filed in this case.

6. Attached hereto as Exhibit D is a copy of an excerpt from a hearing in this case, dated September 19, 2008.

7. Attached hereto as Exhibit E are copies of two confirmations between LBCC and Norton, dated August 26, 2008.

8. Attached hereto as Exhibit F are the English authorities cited in the Debtors' reply that is being filed simultaneously with this declaration.

I declare under penalty of perjury
that the foregoing is true and correct.

/s/ James K. Goldfarb

Executed on February 5, 2010